

Date: May 25, 1995
From: John Martin, OSC
To: Director ERD
and Region 6
Subject: TRI Container Site
Tulsa, Rogers County, Oklahoma
POLREP: # 12

I. BACKGROUND

Site No: 7S
Delivery Order No.: 0035-06-082 OKD070040589
Response Authority: CERCLA
NPL Status: Non-NPL Site
CERCLIS No.: OKD070040589
Start Date: September 29, 1994
Approval Status: Action Memo approved on September 21, 1994

II. INCIDENT INFORMATION

A. Situation

The TRI Container Site (formerly Tulsa Recon Co.) is the location of a former drum refurbishing and manufacturing facility that was abandoned about two years ago. The local post office uses the address of 17400 E. Young St., Tulsa, OK 74116, for the onsite removal command post at the TRI Container site. The Site occupies approximately ten acres with the fenced facility portion occupying five acres. The property contains a large warehouse building divided into a north and south bay, two sheds, a large unlined waste water pond, ten storage tanks with capacities ranging from 4,000 to 20,000 gallons, a large vat of acidic waste, and an estimated 12,000 drums (most drums are empty).

B. Actions Taken

MON 04/17/95; ERCS sort and composite drums. Put clean, non-hazardous water into pond. Twenty-eight drums ready for offsite disposal, 18 drums consolidated in South Yard.

TUE 04/18/95; Consolidate drums for offsite shipment. ERCS load 68 drums for transport to the H.E.A.T. disposal facility. Twenty-one drums consolidated in South Yard.

WED 04/19/95; ERCS resample twenty drums, consolidate drums, and de-head 54 drums for hazard categorization. Drum labeled "Mercaptan" overpacked.

THR 04/20/95; ERCS perform site maintenance, consolidate drums in South Bay, load 72 drums of flammable ash paint (TC-012, TC-014, TC-017) onto truck for transport to the Laidlaw disposal facility.

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FRI 04/21/95; Water decanted from drums in waste group 25, and staged into respective waste class.

SAT 04/22/95; Consolidate and stage drums for offsite disposal.

SUN 04/23/95; Off day.

MON 04/24/95; ERCS consolidate and stage drums in waste groups TC-012, 014, 017, and TC-018, 019, 021 for transport by H.E.A.T. Sort and stage drums into a group below 12.5 pH and a group above 12.5 pH. Profile tank waste and evaluate disposal options.

TUE 04/25/95; ERCS consolidate and stage drums in waste groups TC-012, 014, 017, and TC-018, 019, 021 for transport by H.E.A.T. Sort and stage drums into a group below 12.5 pH and a group above 12.5 pH. Profile tank waste and determine disposal methods. Begin crushing RCRA empty drums with backhoe.

WED 04/26/95; ERCS continue consolidating drums and crush drums with backhoe. A total of 763 crushed drums were loaded into roll-off containers for offsite disposal by Waste Management into their local landfill. H.E.A.T. transport truck loaded with 64 flammable liquid drums (3520 gal.) for disposed offsite.

THR 04/27/95; ERCS crush and load empty drums into roll-off containers which were then transported offsite for disposal.

FRI 04/28/95; ERCS crush and load empty drums into roll-off containers. Waste Management transports full containers offsite to landfill. To date, a total of nine roll-off boxes containing 1490 crushed empty drums have been disposed offsite.

SAT 04/29/95; ERCS crush and load empty drums into roll-off containers. Waste Management transports full containers offsite to landfill. ERCS dispose of samples collected during hazard categorization procedures.

SUN 04/30/95; Off day.

MON 05/01/95; ERCS crush and load empty drums into roll-off containers. Waste Management transports full containers offsite to landfill. TO date, twenty-seven containers of crushed drums disposed offsite.

TUE 05/02/95; ERCS crush and load empty drums into roll-off containers. Waste Management transports full containers off-site to landfill. To date, 5818 crushed drums disposed offsite.

WED 05/03/95; ERCS crush and load empty drums into roll-off containers. Waste Management transports full containers offsite to landfill. ERCS burn approximately one quart of contents found in the "Mercaptan" drum. ERCS begin cleaning equipment and PPE for site demobilization.

THR 05/04/95; ERCS finish loading crushed drums into roll-off containers. To date, 7735 crushed drums disposed off-site.

FRI 05/05/95; a small amount of the tank contents and vat sludge were solidified onsite utilizing kiln dust provided by a neighboring cement manufacturer.

SAT 05/06/95; ERCS prepare for site demobilization. Decontaminate and return equipment to vendors.

SUN 05/07/95; Off day.

MON 05/08/95; ERCS load their equipment on a rented truck for return to their office. Also, they clean and secure command post. Waste Management picks up last roll-off container of crushed drums. ERCS demobilize the site at 1615 hours.

C. Next Steps:

Pending approval of additional funds, crews will mobilize back to the site to complete all offsite disposal of the drums, tank contents, and contaminated surface soils. In the meantime, TAT will evaluate the extent of surface soil contamination now that most of the drums have been removed.

D. Special Issues:

Due to the unexpected high count of drums with hazardous waste contents, additional funding is necessary to complete this removal action. The site assessment estimated that 10% of the approximate 8,000 drums had contents. An accurate count was difficult since most of the drums were stacked and inaccessible. Nearly 12,000 drums required handling with 2,000 drums having contents. The OSC requested that \$50,000 of the approved \$200,000 for TAT be obligated to ERCS with the Total Extramural Costs remaining the same.

III. MATERIALS AND DISPOSITION

Material	Amount/ Method	Location
Waste paint (liquid)	154 dm Fuel blending	Heat Energy(liquid) Advanced Technology Dallas, TX
Waste paint (sludge)	312 dm Fuel blending	Heat Energy Advanced Technology Dallas, TX
Flammable solids (paint chips)	158 dm Fuel blending	Hydrocarbon Recyclers,

Inc. Tulsa, OK

Corrosive liquids 40 dm
(acids) Deactivation

City Environmental
Detroit, MI

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IV. COST INFORMATION

	Amount Budgeted	Cost To Date 04/15/95	Amount (%) Remaining
ERCS	\$ 948,000	\$ 905,613.48	4 %
TAT	\$ 150,000.00	\$ 120,066	20 %
EPA	**	\$ 113,200	**
TOTAL	\$1,240,000	\$1,138,879.48	8 %

TAT: Rick Neeley
STATUS: Case Pending